



Mike Mitchell - ZACB <mike.mitchell@gsa.gov>

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## Fwd: Draft IDEM Communication

1 message

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**Philip Ramos - 5PME** <philip.ramos@gsa.gov>  
To: Mike Mitchell - ZACB <mike.mitchell@gsa.gov>

Thu, Jan 8, 2015 at 9:47 AM

Philip A. Ramos, P.G., CHMM  
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----- Forwarded message -----

From: **Jan Stephenson Cohn - LD5** <jan.cohn@gsa.gov>  
Date: Thu, Dec 26, 2013 at 6:43 PM  
Subject: Re: Draft IDEM Communication  
To: David Rauen - 5PSCE <david.rauen@gsa.gov>  
Cc: Joseph Mulligan - 5PSCE <joseph.mulligan@gsa.gov>, Philip Ramos - 5PME <philip.ramos@gsa.gov>, Tom Hawkins - LD5 <thomas.hawkins@gsa.gov>

Dear Dave,

Thank you for including me on correspondence to Karla Goodman with the Indiana Department of Environmental Management (IDEM). I reviewed Phil's notes from his conversation with Ms. Goodman on December 10, 2013, in addition to the attached violation notice dated August 20, 2013 issued by IDEM's Drinking Water Branch. Karla Goodman is with the Field Inspection Section, as indicated in the notice. As I began to navigate our legal compliance with section 8-2-5.5 of the water quality standards, the violation issued to Bureau of Census indicates assignment of a "case" (?) PWS ID# 2100802. 327 IAC 8-2-5.5 makes reference to "community water systems" (CWS) and "nontransient noncommunity water systems" (NTNCWS), yet these could be distinguishable from "public water systems" (PWS) in application of contaminant levels.

As a point of clarification, does IDEM consider our property in Jeffersonville a PWS, CWS, or NTNCWS? I ask because GSA's construction solution might place this property in another category, possibly making this violation moot. In conducting a search of IDEM's water supply database, I tried several ways to find this particular water supply, and did not find records specific to this property. The "Enforcement Database" is thought-provoking when you compare the multitude of departments and violations issued by IDEM, their enforcement of violations, and solutions acceptable by IDEM.

[http://www.in.gov/apps/idem/oe/idem\\_oe\\_order](http://www.in.gov/apps/idem/oe/idem_oe_order)

**Click [HERE](#) to Request Legal Assistance to ensure your request is received.**

Jan Stephenson Cohn, J.D., LL.M.  
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Great Lakes Division (LD5)

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On Mon, Dec 23, 2013 at 4:18 PM, David Rauen - 5PSCE <[david.rauen@gsa.gov](mailto:david.rauen@gsa.gov)> wrote:  
Hello Karla,

Below is an update on our efforts to address the violation notice at the Jeffersonville Facility.

- GSA has a work order and cost proposal from an architectural/engineering firm to study two options to connect to IAWC supplied water. The study needs to consider fire flow and flow calculations for the facility based on the connections being proposed by IAWC. Once evaluated, the selected option will be designed. The IAWC supplied water will be used throughout the facility in lieu of the ground water. The period to complete these tasks is approximately 10 weeks. We are developing a project schedule to determine constructing the solution and will provide in our next update. Also, we will revise the corrective action plan accordingly.

I also have a couple of questions regarding this project, to which I will give you a call.

Best Regards,

Dave Rauen  
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**Violation Notice 8-20-2013.pdf**

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